

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT TACOMA

WILMINGTON SAVINGS FUND SOCIETY,
FSB, D/B/A CHRISTIANA TRUST, NOT
INDIVIDUALLY BUT AS TRUSTEE FOR
CARLSBAD FUNDING MORTGAGE
TRUST,

Plaintiff,

v.

BRENDA J. DUZAN; FIRST NATIONAL
BANK OF OMAHA; ALSO ALL PERSONS
OR PARTIES UNKNOWN CLAIMING ANY
RIGHT, TITLE, LIEN, OR INTEREST IN THE
PROPERTY DESCRIBED IN THE
COMPLAINT HEREIN,

Defendants.

Case No. 3:16-cv-05721-RBL

DECLARATION OF WESLEY WERICH IN
SUPPORT OF PLAINTIFF'S MOTION TO
REMAND

I, Wesley Werich, declare:

1. I am an attorney at Robinson Tait, P.S., the law firm representing Plaintiff in the above captioned action. I am personally familiar with the facts stated below and if called as a witness could competently testify to the matters herein.

2. I graduated from the University of Oregon School of Law in May of 2006 and have been a member of the Washington bar since November 2006. I am licensed to practice in Washington State and Oregon State including in the respective federal and bankruptcy courts for said jurisdictions.

3. I have been employed at the law firm of Robinson Tait, P.S. since 2010 and am a litigation associate at the firm. For the past six years, I have practiced in several creditor's rights areas including foreclosure, bankruptcy, eviction, and title curative. I have both taken several continuing legal education coursework in this same field and also provided training in these areas.

4. Prior to my employment at Robinson Tait, P.S., I practiced primarily in the areas of healthcare and personal injury law.

5. I believe that an hourly rate of \$215 is reasonable for my services in this matter based on my experience the going rate for Seattle-area based attorneys.

6. Attached as Exhibit A is a true and correct copy of the time spent working on this matter insofar as it relates to Plaintiff's Motion to Remand. Per Exhibit A, I spent 6.1 hours at a rate of \$215.00, totaling \$1,311.50 for my work on this Motion to Remand.

I declare under the penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 8th day of September 2016 at Seattle, Washington.

/s/ Wesley Werich
Wesley Werich, WSB #38428
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on September 8, 2016, I electronically filed the foregoing DECLARATION OF WESLEY WERICH IN SUPPORT OF PLAINTIFF'S MOTION TO REMAND with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to all parties as listed on the Notice of Electronic Filing.

I further certify that on September 8, 2016, in compliance with the notification requirements pursuant to the laws of the State of Washington, I caused to be deposited in the United States first class mail, postage pre-paid, copies of the foregoing DECLARATION OF WESLEY WERICH IN SUPPORT OF PLAINTIFF'S MOTION TO REMAND, addressed to each of the following:

Brenda J Duzan
17426 85TH AVE CT E
PUYALLUP, WA 98375
Pro Se

DATED this 8th day of September, 2016, at Seattle, Washington.

/s/ Natalie Quarnstrom
Natalie Quarnstrom
An employee of Robinson Tait, P.S

EXHIBIT A

Time Keeper	Date	Hours	Rate	Amount
Werich, Wesley	8/26/2016	4.3	\$215.00	\$924.50
draft motion to remand including legal standard for removal and argument in support of remand and request for plaintiff's attorneys fees and costs; draft declaration iso of time spent on responding to removal; draft proposed order.				
Werich, Wesley	8/25/2016	1.8	\$215.00	\$387.00
review defendant's motion to remove; legal research on removal and remand including basis for removal, time frame for removal and remand and atty fees and costs for improper removal; review state court docket for time frame of lawsuit				
Total				\$1,311.50

6.1